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9 UNIVERSITY OF NORTHERN  
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11 and Y. KING LIU

12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14  
15 SAN FRANCISCO DIVISION

16 JOHN STALCUP, DENNIS McGOWAN,  
17 and MICHAEL LYSTER,

18 Plaintiffs,

19 vs.

20 Y. KING LIU, UNIVERSITY OF  
21 NORTHERN CALIFORNIA  
22 FOUNDATION,

23 Defendants.

Case No. C 11-00002 JSW

**STIPULATION TO CONTINUE CASE  
MANAGEMENT CONFERENCE  
ORDER THEREON AND ORDER  
REGARDING MOTION HEARING**

DATE: April 15, 2011

TIME: 1:30pm

COURTROOM: 2, 17th floor

JUDGE: Hon. Jeffrey White

Pursuant to Local Rule 6-2, Plaintiffs John Stalcup, Dennis McGowan, and Michael Lyster, and Defendants University of Northern California Foundation (“UNCF”) and Y. King Liu (Chairman of the Board, University of Northern California Foundation) hereby stipulate and agree to continue the case management conference by approximately six weeks.

Previously, the parties have stipulated to extensions of time regarding Defendants' deadlines to file a motion to dismiss or otherwise respond to the complaint and Plaintiffs' deadline to file a motion for remand. [Docket Nos. 8 and 10] Such extensions were intended to facilitate the parties' settlement discussions, in an effort to resolve this case in an efficient manner.

On March 1, 2011, the parties engaged in private mediation in an attempt to resolve their disputes. On March 21, 2011, Plaintiffs provided Defendants with a term sheet for consideration. The parties are still, therefore, engaged in settlement discussions. Under the current schedule, however, the Court's initial case management conference is set for April 15, 2011; the parties' Joint Case Management Statement and initial disclosures under Rule 26(a)(1) are currently due on April 8, 2011; and the parties must meet and confer under Rule 26(f)(1) by March 25, 2011. Continuance of the case management conference and, accordingly, all other deadlines triggered by the date of that conference, will help to facilitate the parties' ongoing settlement discussions.

Accordingly, the parties request that the Court's initial case management conference be continued from April 15, 2011 to June 10, 2011 or any date shortly thereafter, excluding the period of July 15-31, 2011, when counsel are not available. (Alternatively, if the Court is unavailable on June 10, 2011, then the parties would agree to a case management conference for May 27, 2011).

The parties do not believe that this modest extension of time will have any effect on the schedule for this case.

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IT IS SO STIPULATED THIS 23rd day of March, 2011.

Dated: March 23, 2011

HOGAN LOVELLS US LLP

By: /s/ Constance F. Ramos

Constance F. Ramos

Attorneys for Defendants UNIVERSITY OF  
NORTHERN CALIFORNIA FOUNDATION  
and Y. KING LIU

Dated: March 23, 2011

FLAXMAN & BLAKELY

By: /s/ Bruce W. Blakely

Bruce W. Blakely

Attorneys for Plaintiffs JOHN STALCUP,  
DENNIS MCGOWAN, and MICHAEL  
LYSTER

The Initial Case Management Conference is continued to June 10, 2011 at 1:30. IT IS SO  
**ORDERED. If the parties also seek a continuance of the motion hearing scheduled for March 25,**  
**2011 at 9:00 a.m., they should submit the appropriate request to the Court.**

March 23, 2011

  
JEFFREY S. WHITE  
UNITED STATES DISTRICT JUDGE

I, Constance F. Ramos, attest that Bruce W. Blakely has read and approved the STIPULATION  
TO CONTINUE CASE MANAGEMENT CONFERENCE and consents to its filing in this action.